

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**LA UNIÓN DEL PUEBLO ENTERO,  
FRIENDSHIP WEST BAPTIST  
CHURCH, THE ANTI-DEFAMATION  
LEAGUE AUSTIN, SOUTHWEST, AND  
TEXOMA REGIONS, SOUTHWEST  
VOTER REGISTRATION EDUCATION  
PROJECT, TEXAS IMPACT, MEXICAN  
AMERICAN BAR ASSOCIATION OF  
TEXAS, TEXAS HISPANICS  
ORGANIZED FOR POLITICAL  
EDUCATION, JOLT ACTION,  
WILLIAM C. VELASQUEZ INSTITUTE,  
FIEL HOUSTON INC., and JAMES  
LEWIN,**

**Plaintiffs,**

**Case No. 5:21-cv-844-XR**

**v.**

**THE STATE OF TEXAS, JOHN B.  
SCOTT, in his official capacity as the  
Texas Secretary of State, WARREN K.  
PAXTON, in his official capacity as the  
Texas Attorney General, MICHAEL  
SCARPELLO, in his official capacity as  
the Dallas County Elections  
Administrator, and LISA WISE, in her  
official capacity as the El Paso County  
Elections Administrator,**

**Defendants.**

**MOTION FOR ADMISSION *PRO HAC VICE* OF ROBYN SANDERS**

TO THE HONORABLE JUDGE OF SAID COURT:

Comes now Robyn Sanders, applicant herein, and moves this Court to grant admission to the United States District Court for the Western District of Texas *pro hac vice* to represent Plaintiffs Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma

Regions, Texas Impact, and James Lewin in this case, and would respectfully show the Court as follows:

1. I am an attorney and a member of the law firm Brennan Center for Justice at NYU School of Law with offices at:

120 Broadway, Suite 1750  
New York, NY 10271  
Telephone: (646) 925-8765  
Facsimile: (212) 463-7308

2. Since October of 2021, I have been and presently am a member of and in good standing with the Bar of the State of North Carolina. My North Carolina bar license number is 58339.

3. I have been admitted to practice before the following courts:

Supreme Court of North Carolina                      Admitted: October 29, 2021

4. I am presently a member in good standing of the bar of the court listed above.

5. I have not previously applied to appear *pro hac vice* in this District Court.

6. I have never been subject to grievance proceedings or involuntary removal proceedings while a member of the bar of any state or federal court.

7. I have not been charged, arrested, or convicted of a criminal offense or offenses.

8. I have read and am familiar with the Local Rules of the Western District of Texas and will comply with the standards of practice set out therein.

9. I will file an Application for Admission to Practice before the United States District Court for the Western District of Texas, if so requested; or I have co-counsel in this case who is admitted to practice before the U.S. District Court for the Western District of Texas:

Sean Morales-Doyle  
120 Broadway, Suite 1750  
New York, NY 10271  
Telephone: (646) 292-8363

Should the Court grant applicant's motion, I shall tender the amount of \$100.00 *pro hac vice* fee in compliance with Local Court Rule AT-l(f)(2), made payable to: Clerk, U.S. District Court.

Wherefore, I pray that this Court enter an order permitting the admission of Robyn Sanders to the Western District of Texas *pro hac vice* for this case only.

Respectfully submitted,

/s/ Robyn Sanders

North Carolina Bar No. 58339  
BRENNAN CENTER FOR JUSTICE AT  
NYU SCHOOL OF LAW  
120 Broadway, Suite 1750  
New York, NY 10271  
Telephone: (919) 360-9250  
Facsimile: (212) 463-7308  
[sandersr@brennan.law.nyu.edu](mailto:sandersr@brennan.law.nyu.edu)

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of this motion upon each attorney of record and the original upon the Clerk of Court on this the 25th day of January, 2023.

/s/ Elizabeth Y. Ryan

Elizabeth Y. Ryan